

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Richard P. Krasnow

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Case No. 08-13555 (JMP)

Chapter 11

(Jointly Administered)

**MOTION PURSUANT TO RULE 2090-1(b) OF THE LOCAL
RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK FOR ADMISSION PRO HAC VICE**

Richard P. Krasnow (“Movant”), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States Bankruptcy Court for the Southern District of New York, and a partner in Weil Gotshal & Manges LLP, hereby moves this Honorable Court to enter an order permitting Mark S. Hersh, a partner in Reed Smith, to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent Lehman Brothers Holdings Inc. in the above captioned proceedings pursuant to Local Rule 2090-1(b) of the United States Bankruptcy Court for the Southern District of New York, and, in support thereof, avers as follows:

1. By order dated July 21, 2010, this Court approved an application to have Reed Smith LLP retained as special counsel to the Debtors with respect to directors’ and officers’ liability insurance coverage.

2. In support of the relief requested in this Motion, attached as Exhibit A is a certificate pursuant to Local Rule 2090-1(b) of the United States Bankruptcy Court for the Southern District of New York. As set forth therein, Mr. Hersh is a member in good standing of the Bar of Illinois. He is also admitted to practice before the United States District Court for the Northern District of Illinois.

3. Movant requests that this Court approve this Motion so that Mr. Hersh may file pleadings and appear and be heard in these proceedings.

4. No previous motion for the relief sought herein has been made to this or any other court.

REQUESTED RELIEF

WHEREFORE, Movant respectfully requests that the Court enter an Order permitting Mark S. Hersh, to appear *pro hac vice* as counsel to Lehman Brothers Holdings Inc. in the above-captioned proceedings.

Dated: New York, New York
October 18, 2011

/s/ Richard P. Krasnow
Richard P. Krasnow
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

I certify that I am eligible for admission to this Court, am admitted to practice in the State of Illinois and the United States District Court for the Northern District of Illinois, and am in good standing in such jurisdictions; I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course, or in the preparation, of these chapter 11 cases, pursuant to Local Rule 2090-1(b) of the United States Bankruptcy Court for the Southern District of New York; and I have access to, or have acquired, a copy of the Local Rules of this Court and am generally familiar with such Rules.

Mailing Address: Mark S. Hersh
Reed Smith LLP
10 South Wacker Drive
Suite 4000
Chicago, IL 60606-7507

E-mail: mhersh@reedsmith.com

Telephone: (312)207-6427

Facsimile: (312)207-6400

I have agreed to pay the requisite fee upon arrival by this Court admitting me to practice *pro hac vice*.

Dated: New York, New York
October 18, 2011

/s/ Mark S. Hersh
Mark S. Hersh

Reed Smith LLP
10 South Wacker Drive
Suite 4000
Chicago, IL 60606-7507

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Case No. 08-13555 (JMP)

Chapter 11

(Jointly Administered)

**ORDER GRANTING MOTION PURSUANT TO RULE 2090-1(b) OF THE
LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK FOR ADMISSION PRO HAC VICE**

Upon consideration of the Motion Pursuant to Rule 2090-1(b) of the Local Rules of the United States Bankruptcy Court for the Southern District of New York for Admission Pro Hac Vice (the “Motion”) seeking admission *pro hac vice* of Mark S. Hersh, to represent Lehman Brothers Holdings Inc. in the above-captioned proceedings before the United States Bankruptcy Court for the Southern District of New York as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and upon the Motion and all proceedings had before the Court; and after due deliberation and it appearing that there is sufficient cause to grant the Motion;

IT IS HEREBY ORDERED that Mark S. Hersh is permitted to appear *pro hac vice* as counsel to Lehman Brothers Holdings Inc. in the above-captioned proceedings, subject to the payment of the filing fee.

Dated: October __, 2011
New York, New York

HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE